

Exhibit 34

DECLARATION OF DAVID KROMA

1. My name is David Kroma, and I am one of the Plaintiffs in attached lawsuit seeking to enjoin the termination of Deferred Enforced Departure (DED) for Liberians.
2. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.
3. I have been residing in the United States for 19 years. I arrived in the United States in or around November 1999. I have been a beneficiary of both the TPS and DED designations granted to Liberians residing in the United States and currently have DED.
4. I am submitting this declaration to describe the harm my family and I have suffered since the announcement of the termination of DED for Liberians, and the harm my family and I will suffer if DED is terminated.

Background

5. I was born in Liberia on January 8, 1973. I am 46 years old. I live in Worcester Massachusetts.
6. I left Liberia in 1999 because of extreme violence and lack of employment opportunities. The civil wars and poverty made it impossible for me to continue to live there.
7. I came to Massachusetts in 1999 and settled in Worcester. I own my own home and have lived and worked in the Worcester community for almost 20 years. I work as a mental health care worker at Worcester State Hospital and Recovery Center, although I am currently on leave because of a workplace injury. I have worked there for over 18 years. I do very important work assisting a variety of people with mental health disabilities who come to the hospital from all over the state. I am very good at my job and have been promoted from Mental Health Care

worker 1 to Mental Health Care Worker 4. The patients and their care are of utmost importance to me.

Impact of Deferred Enforced Departure

8. TPS and DED have been vital programs for me and have allowed me to feed and support my family and be a productive member of my community. I have renewed my work authorization and applied for status whenever it was time to renew.

9. Employment has been very important to me. I have a wife and six kids and many other relatives that I support financially.

10. It would be devastating for me to return to Liberia. I have a job, a home, a community and family in Worcester. All these things would be torn from me and would suffer from my absence.

Impact of the Decision to Terminate DED

11. I don't know what I will do if DED is terminated. My children, who are all U.S. citizens, born in MA, depend on me as their father, and I need to be here for them. They are still young, my oldest is only 14 years old and then my children are 12, 11, and 10 years of age with two 4 year olds as well. Every day they come to me needing things only their father can provide. Leaving would not only hurt me but would remove support for my children. It will fundamentally disrupt their lives and educations for me to leave.

12. I will be deeply harmed if I am forced to return to Liberia. It is a dangerous country with no infrastructure for health care and where I have not lived for almost twenty years. I would lose my job and suddenly be without a home or income.

13. I would face further harm coming from America. I know people returning from the United States are sometimes targeted for their money or other resources.

14. When the termination was announced it was crushing. I have not been able to sleep and have constant anxiety about the future and my children's' future.

15. My children, wife and other relatives also live in constant stress and fear of what will happen. The termination announcement has already had a harmful impact on my family and will decimate my family's ability to thrive in Massachusetts. My children have never been to Liberia and have spent their whole lives in the United States. This is their home and they are afraid of me being taken away or them being forced to leave.

16. I have advocated for myself and my community of Liberian DED holders. I am part of community groups who are seeking to extend DED status so that we can continue to have lives in the homes we have built.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5 day of March, 2019, in Worcester.



David Kromer